



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI 64106

AUG 04 1983

Mr. Gary T. Mason
Environmental Coordinator
Vulcan Materials Company
P.O. Box 12283
Wichita, Kansas 67277-2283

Kate Berger, SPP
Dave
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EPA I.D. NO.: KSD007482029

Dear Mr. Mason:

We have reviewed your June 24, 1983, submittal outlining plans for closure of LP-2 (Lined Pond #2). Prior to approval of the plan, EPA and the Kansas Department of Health and Environment (KDHE) request submittal of the following additional information.

Decontamination of Equipment and Structures

1. Will the liner still be in place or what other precautions will be taken to prevent contamination of underlying soils during the decontamination process?
2. How will it be determined that the structures and equipment are properly decontaminated?
3. Will contaminated washwater be processed through the wastewater system?

Removal of Liner

4. Please provide further information on how the EP Toxicity test will be used to determine that the liner is a hazardous waste. The KDHE must approve any requests for disposal of the liner at a sanitary landfill.

Sampling and Removal of Subsurface Soils

5. How were soil samples A-E taken since the residues and liner are apparently still intact?
6. Why were these sampling locations chosen? Is there a seam (weld) in the liner at the sampling points?
7. Why did the sampling interval (depth of sample) change for samples D and E?
8. Please provide a sketch or sufficiently detailed narrative explanation as to the location of and rationale for removing 100 cubic feet of subsurface soil. What is the size (area) of the base of LP-2?

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Superfund

Additional Comments

9. The plan should include the name and location of the disposal facilities for the liner and drummed residues. We assume that disposal of the drummed residues at an appropriate landfill is a hazardous waste landfill.
10. The closure plan should also include an estimate of the amount of waste to be removed at closure.
11. Closure of LP-2 can begin after approval of the closure plan. The response to this letter should also include a schedule for completing closure of LP-2.
12. Since closure of LP-2 is a partial closure, a public notice will be issued in accordance with 265.112.
13. The closure certification requirements of 265.115 must be met.

We concur that closure of LP-2 by removal of all waste, waste residue, liner and contaminated soil will eliminate the need for post-closure care.

If you have any questions on this letter, please contact Karen A. Flournoy at (816) 374-6531.

Sincerely yours,



Robert L. Morby
Chief, Waste Management Branch
Air and Waste Management Division

cc: John Goetz, KDHE